

REMARKS/ARGUMENTS

This amendment is filed in response to the Office Action mailed January 10, 2007, a response to which is due to be filed by April 10, 2007. No claims have been added by way of this amendment. Accordingly, the Applicants respectfully submit that no fees are due in connection with this submission and, in particular, extension of time fees. In the event the Applicants are mistaken, the Commissioner is hereby authorized to deduct any required fees and, in particular, any fees due under 37 C.F.R. § 1.17(a), from our Deposit Account No. 13-2400 in connection with this and future replies.

As set out in the previous section, clarifying amendments have been made to claims 1, 2, 4, 6, 11, 12, 14, and 15. In particular, the independent claims have been amended to specify that each of the static blocks and dynamic blocks (or memory blocks in claim 14) is an erase block, which is a minimum erasable portion of the memory device. This is the sense in which the Applicants have consistently used the term "block" in the specification. Reference may be made to paragraph [0003]. The Applicants respectfully submit that these amendments merely clarify the scope of the claim language as it was originally filed and do not constitute a narrowing amendment.

The Applicants wish to thank the Examiner for the courtesy of conducting a telephone interview with the Applicants' agent on March 20, 2007. At that time, the Examiner and the Applicants' agent discussed a proposed set of claim amendments. During the telephone interview it was agreed that the amendments reflected above would address the Examiner's concern with claim language interpretation and is likely to address the Examiner's art-based rejections.

In view of the foregoing amendments, the Applicants respectfully submit that the application is in condition for allowance. The Examiner's art-based rejections based upon Parker (US Patent No. 6,535,949) are respectfully traversed on the basis that Parker fails to teach or suggest the subject matter claimed in the independent claims in


the present application wherein the static and dynamic blocks are erase blocks and wherein those blocks are further divided into sectors and within each dynamic block one of the sectors is allocated for writing and reading meta data and the remaining sectors in the dynamic block are available for writing and reading data.

Should there be any questions with regard to the foregoing amendments or submissions, the Applicants ask that the Examiner contact the Applicants' agent, Fraser Rowand, at 416-868-1482. In particular, should the Examiner be inclined to maintain his rejections based on the Parker reference, the Applicants' agent respectfully requests an opportunity to discuss those rejections by telephone with the Examiner.

Respectfully Submitted,

LIN, Lin, et al.

By:



Fraser D. Rowand, Regn. No.53,870

Place: Toronto, Ontario, Canada
Date: March 22, 2007
Tele No.: 416-868-1482